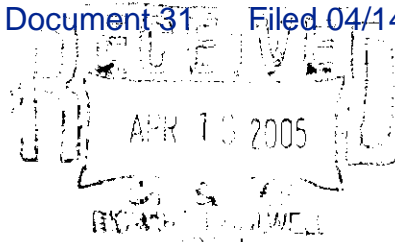


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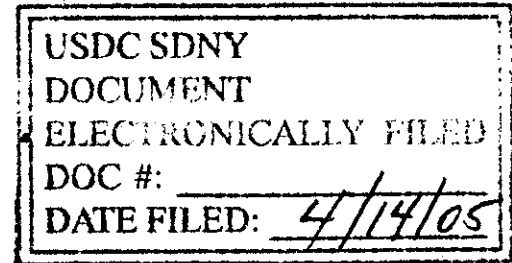
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April 12, 2005

BY HAND

The Honorable Richard J. Holwell
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1950
New York, New York 10007



Re: **Innovative Custom Brands, Intl. v. Sole City, Inc. et al.**
Civ. Action No. 04 CV 2937; and
Full Creative Limited v. Sole City, Inc., et al.
Civ. Action No. 04 CV 02907

Dear Judge Holwell:

We are writing to you on behalf of the Plaintiffs Innovative Customs Brands, International and Full Creative Limited regarding the status of the above captioned actions.

In accordance with your Honor's February 28, 2005 order (the "Order"), an inspection was undertaken in the basement of Mr. Safdeye's mother's home on March 21, 2005. During this inspection, Mr. Safdeye made available to Plaintiffs 19 out of what was previously reported to be approximately 50 boxes which had been originally stored in the garage at this location.

Subsequent to this examination, on March 22, 2005, we orally notified Mr. Safdeye of certain obvious deficiencies regarding the documents inspected, the most glaring being the absence of any sales documentation for 2004. This notice was later memorialized in a letter sent to Mr. Safdeye dated March 30, 2005, annexed hereto. In addition, we have also requested that Mr. Safdeye provide the back-up documentation to support the sworn net worth statement also submitted pursuant to this Court's Order. To date, we have yet to receive any response to these requests.

Honorable Richard J. Holwell

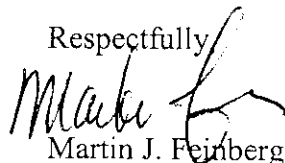
April 12, 2005

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Since the end of last year, we have endeavored to obtain the documentation necessary to move this matter forward and conduct the necessary depositions. To date, these efforts have been stalled by Mr. Safdeye. In light of these still pending discovery disputes, we would respectfully request that the current discovery schedule be amended and extended for an additional four-month period. This schedule of course assumes that Mr. Safdeye will comply with Plaintiff's First and Second Set of Document Requests within the next 30 days. This extension would push back the discovery cut-off date to July 29, 2005. Under this proposed schedule, the deadline for serving dispositive motions would then become August 22, 2005.

Finally, as per this Court's Order, the parties have attempted to resolve their differences, but unfortunately have been unable to do so. Therefore, we would request that the April 22, 2005 settlement conference be adjourned at this time. Absent Mr. Safdeye's compliance with our outstanding document requests, we would ask that your Honor refer this matter back to Magistrate Judge Gorenstein to resolve these issues.

Respectfully

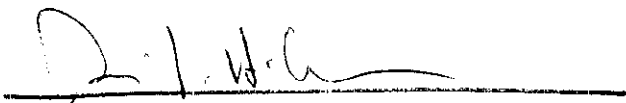

Martin J. Feinberg

MJF:em
Enclosure

cc: Mr. Solomon Safdeye via regular mail

In light of the parties' inability to settle and the outstanding discovery disputes, the matters are returned to Judge Gorenstein for pretrial purposes.

So ORDERED.



U.S.D.J.

*Dated: New York, NY
April 14, 2005*